

PE Lusby
Islandmore River Foyle
Co. Donegal

Date: 27 October 2021

Re: Proposed Riverine Pedestrian and Cycle Bridge at Station Road, Lifford, Co. Donegal
115m in length between Lifford Co. Donegal and Strabane, Co. Tyrone

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above mentioned proposed road development and will take it into consideration in its determination of the matter. A receipt for the fee lodged is enclosed.

Please note that the proposed road development shall not be carried out unless the Board has approved it or approved it with modifications.

If you have any queries in relation to this matter please contact the undersigned officer of the Board.

Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,


Niamh Thornton
Executive Officer
Direct Line: 01-8737247

HA02

AN BORD PLEANÁLA	
LDG-	845183-2
ABP-	311468 & 311542
20 OCT 2021	
Fee: €	50 Type: PMO
Time:	By: negpost

SUBMISSION - AN BORD PLEANALA

RIVERINE PROJECT STRABANE LIFFORD

As occupier and owner of the area adjacent to the Riverine Project I am dismayed that I was not contacted during any of the application's assessments, as I believe, that in doing so the project promoters have erred in law.

The Environmental Statement [volume 2] is deficient in a number of areas, particularly in relation to flooding:

- Existing flood attenuation measures do not include the Foyle beyond the High Water Mark and no consideration for a Flood Management Plan, of the Foyle, north of Lifford is contained within the document. The Foyle is a major component of the catchment area and cannot be minimised.
- Statistics on the composition of the base materials of the Foyle flood plain are calculated without the impact of rainfall inclusion. For example, the significant rainfall of 2015 is not included in the analysis. A fuller analysis would reveal the morphological properties of the floodplain and the dangers to life and property within. Recent historic incidences of morphological actions within close proximity of the project site are clear to see and are not mentioned within the documents.
- Fluvial interaction is not assessed in the project documents
 Sand and gravel extraction has taken place within the Foyle for a considerable period of time. The most recent and adjacent to, or part of the project site, is on the Donegal embankment opposite the Northern Ireland outflow of the Strabane Waste Water plant. This deposit is not mentioned in the project document. Historically the Ballast Company which was renamed the Londonderry Port and Harbour Commissioners in the 1854 Act used gravel from this area of the Foyle as ballast for sailing ships and is one of the reasons that the limits of the Londonderry Port and Harbour is set within the 1854 Act as to extend from Lifford Bridge to a Line drawn from Greencastle Fort in the County of Donegal to the Tower on Magilligan Point in the City and County of Londonderry. The Londonderry Port and Harbour is the statutory body under the 1854 Act and is not mentioned in the project documents. There is also photographic evidence of the Crawford family [Councillor Crawford] unloading sand in 1946 at Lifford adjacent to the project site. No assessment is made within the documents as to fluvial deposits and loss of channel conveyance which could increase the flood risk to the project site on an annual basis. The available CFRAM documents indicate an improved channel conveyance option adjacent to the site at a cost of 40 million euro and 102 million euro to include the benefit to the mouth of the river Deele.
- The Flood Risk Assessment for the A5 road project was considered inadequate by the PAC NI and it is the same assessment criteria used in this project.

5. Bridge

No assessment as to the constraints, a low bridge at this position, would cause to the management of the Foyle in relation to flood alleviation is contained within the project documents. In the documents at F-P-7 it states that, "The Council shall not permit developments that would hinder the maintenance of rivers or drainage channels.

6. Human Health

The document is deficient in relation to Human Health. During the winter of ~~1997 to 1998~~ 1998 Human Health was impacted due to the contamination of Islandmore, which is in close proximity to the project site, with the bacterium *Brucella Abortus*. A survey and report carried out by Donegal County Council at the time found evidence of sewage contamination on the land of Islandmore.

This contamination was linked to Brucellosis in humans in subsequent years as detailed by the Health Executive of Northern Ireland.

Quote

In 2002 there were 28 reported cases of human brucellosis in Northern Ireland and since 1998 there have been more than 70 cases reported. Yet, in the period 1985-1997 there had been no reported cases. This disease is normally contracted directly from breeding cattle and this recent upsurge in human brucellosis is directly linked to the current outbreak in Northern Ireland's cattle. Many of these recent cases are farmers who became infected through contact with infected animals. Tackling the disease in cattle is therefore essential if human health is to be protected.

7. Loughs Agency

I constructed the fishing groynes adjacent to the project site on behalf of the Loughs Agency for the benefit of the local population. I understood at the time that the groynes would be maintained and not allowed to inhibit flood capacity. Unfortunately, no maintenance has taken place and the groynes are not used and have deteriorated and are a source of invasive plants and barriers to the free flow of the Foyle.

These are also not considered in the documents.

8. Sewage

As mentioned above contamination of land in time of high rainfall impacts human health. The potential of the two sewage plants to contaminate the project area has not been evaluated in the documents. In December 2015 Strabane Waste Water Plant was flooded, and no analysis is contained within the documents even though previous sewage overflows in this area have been recorded to circulate adjacent to the project site due to tidal pressures.

It is also noted that in the planning application for the Lifford Wastewater plant no outflow is applied for and the documents are deficient as to the present condition of the outflow.

No consideration is given in the documents regarding storm surge impacts of the sewage works on either side of the Foyle above or adjacent to the project site.



ISLANDMORE RIVER FOYLE

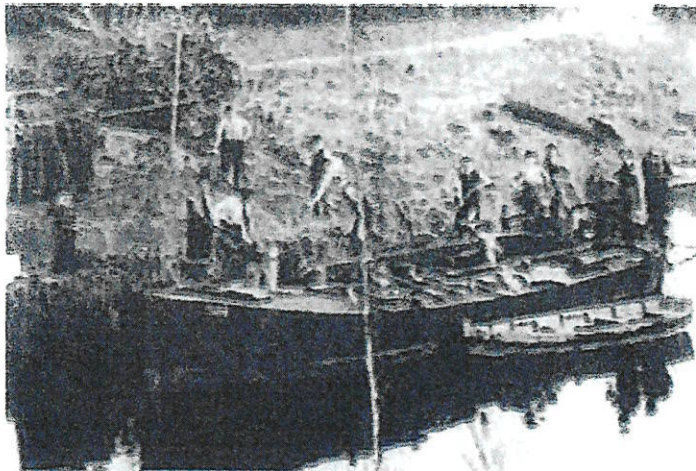
9. Alternatives to the project

The existing infrastructure, Lifford bridge, flood and disused railway embankments linking Islandmore bridge and the existing Foyle bridge were not considered as an alternative to the bridge portion of the project.

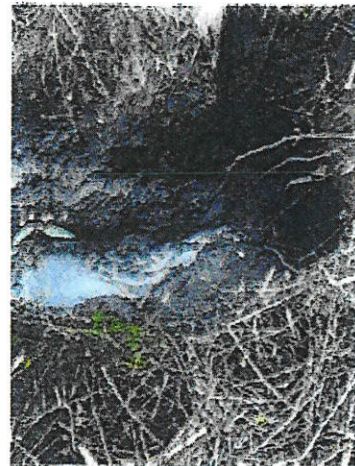
SIGNED

PE LUSBY

~~PE LUSBY 0599129~~



SAND DISCHARGED AT LIFFORD 1946



LIFFORD SEWAGE OUTLET
13th OCT 2021



STRABANE/LIFFORD FLOODING, 2015



LIFFORD SEWAGE OUTLET
13th OCT 2021